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Attorneys for Creditor
SILICON VALLEY BANK

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

In re)	Case No. 16-31325 HLB
)	
WRAP MEDIA, LLC,)	Chapter 11
)	
Debtor.)	
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In re)	
)	
WRAP MEDIA, INC.,)	Case No. 16-31326 HLB
)	
Debtor.)	Chapter 11
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___ Affects LLC)	Date: March 2, 2017
___ Affects Inc.)	Time: 11:00 a.m.
<u>X</u> Affects BOTH DEBTORS)	Judge: Hon. Hannah L. Blumenstiel
)	Court: 17

**RESPONSE OF CREDITOR SILICON VALLEY BANK TO DEBTORS' CONTINUED
MOTION FOR USE OF CASH COLLATERAL AND BORROWING MOTION**

1 Creditor Silicon Valley Bank (“SVB”)¹, as a creditor and not on behalf of the Committee,
2 hereby reserves its right to oppose Debtors’ pending Motion for Use of Cash Collateral [Doc.
3 No. 7] and Borrowing Motion [Doc. No. 8] (the “Financing Motions”).

4 Debtors’ Status Report [Doc. No. 103] references a change in Debtors’ strategy for
5 navigating its Chapter 11 proceeding, and also references a Proposed Budget which is not
6 attached. Moreover, Debtors’ pending application to employ Carr & Ferrell [Doc. No. 104] does
7 not set forth, among other things, (a) the attorneys at Carr & Ferrell who are anticipated to act as
8 corporate counsel in the sale of technology (and billings rates therefore cannot be ascertained),
9 and (b) whether the Debtors intend to pay Carr & Ferrell during the course of the bankruptcy
10 proceeding. Without such information, SVB cannot determine whether Debtors’ strategy, budget
11 and proposed timeline to a sale represents a sensible approach to the case that SVB would
12 support.

13
14 DATED: February 23, 2017

LEO D. PLOTKIN
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17 By: /s/Leo D. Plotkin
LEO D. PLOTKIN
Attorneys for Secured Creditors
SILICON VALLEY BANK

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28 ¹ SVB holds a first-priority security interest in all of Debtors’ assets with the exception of its
intellectual property (except to the extent that SVB does hold a first-priority adequate protection
lien secured by Debtors’ intellectual property). SVB believes that it is substantially under
secured and has been appointed to the Unsecured Creditors’ Committee (the “Committee”).